

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: CELESTE ANN WOMACK Debtor NO. 13-02957-EE

CELESTE A WOMACK PLAINTIFF

VERSUS ADVERSARY NO. _____

TTLBL, LLC; CHARLES E. STOKES,
HINDS COUNTY TAX ASSESSOR; EDDIE J.
FAIR, HINDS COUNTY TAX COLLECTOR; EDDIE JEAN CARR,
HINDS COUNTY CHANCERY CLERK DEFENDANTS

COMPLAINT TO SET ASIDE TAX SALE

Comes now CELESTE A WOMACK, by and through her attorney, and bring this her
Complaint to Set Aside Tax Sale:

1. The Court has jurisdiction pursuant to 28 U.S.C. Section 1334, 28 U.S.C. Section 151 et seq., and 11 U.S.C. Section 101 et seq. Venue is appropriate pursuant to 28 U.S.C. Section 1409.

2. The matter is a core proceeding pursuant to 28 U.S.C. Section 157(B)(2).

3. This motion is brought pursuant to 11 U.S.C. Section 362(a)(3) et seq; 11 U.S.C. Section 362(k); 11 U.S.C. Section 105(a); and Rule 7001 F.R. Bankr.P.

4. Plaintiff, in the debtor is this action.

5. Defendants TTLBL, LLC is the purchaser of the subject property at the tax sales and can be served at 4747 Executive Drive, Suite 510, San Diego, CA 92121, there being no registered agent in the State of Mississippi, and the registered agent, Peter D. Antonopolos, Esq., 1725 DeSales St NW, Suite 600, Washington, D.C. 20036.

6. CHARLES E. STOKES, HINDS COUNTY TAX ASSESSOR, P.O. Box 22908, Jackson, MS 39225-2908; EDDIE J. FAIR, HINDS COUNTY TAX COLLECTOR, P.O. Box 1727, Jackson, MS 39215; and EDDIE JEAN CARR, HINDS COUNTY CHANCERY CLERK, P.O. Box 686, Jackson, MS 39205.

7. That the Chancery Clerk of HINDS County, Mississippi, has transferred property that is an asset of the bankruptcy estate to TTLBL, LLC.. Under Section 27-43-1 and Section 27-43-3 of the Mississippi Code of 1972, as amended, the tax sale has been done improperly with notices given in an improper manner. The last Notice of the tax sale were not provided to Plaintiff and she was therefore not give a time of redemption, in violation of state law, therefore the tax sale should be set aside.

WHEREFORE, PREMISES CONSIDERED, Debtor request that this court set aside the TAX SALE for 2013 and set aside the Tax Deed, Book 7214, Page 3449, recorded November 28, 2017, in the land records of the Chancery Clerk of Hinds County, Mississippi, and grant such other and further relief as may be just and proper.

CELESTE A WOMACK

By: /s/ Richard R. Grindstaff
RICHARD R. GRINDSTAFF

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